

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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March 9, 2023

**Via ECF**

The Honorable Laura Taylor Swain  
Chief United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

**Re: United States v. Jackson  
21 Cr. 537 (LTS)**

Dear Chief Judge Swain,

We write on behalf of Mr. Jackson and with the consent of the Government and Probation Office to respectfully request an adjournment of the schedule for disclosure of the final Presentence Investigation Report (PSR) in the above-captioned matter.

Mr. Jackson's sentencing is scheduled for May 9, 2023. The Probation Office has interviewed Mr. Jackson and provided the parties its first disclosure of the draft PSR. The draft PSR discusses several issues that the defense needs additional time to investigate and review in order to properly respond or object. While the defense is not seeking an adjournment of sentencing, we respectfully request that the Court adjourn the deadline for disclosure of the final PSR until April 18, 2023 so that the defense may investigate and provide objections to the draft PSR and the Probation Office can review and respond to the defense's submission.

We thank the Court for its consideration of this request.

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| “The foregoing extension request is granted.<br>DE 74 is resolved.<br>SO ORDERED.<br>3/10/2023<br>/s/ Laura Taylor Swain, Chief USDJ | Respectfully submitted,<br><br>/s/ Neil Kelly<br><br>Neil P. Kelly<br>Assistant Federal Defender<br>(212) 417-8744 |
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cc: AUSA Jacob Gutwillig  
Probation Officer Christopher Paragano